



MICHAEL GEOGHEGAN, PRESIDENT

110 John Scott Highway
Steubenville, OH 43952
United States

mgeoghegan@egcc.edu
(740) 264 - 5591 ext. 1729

July 22, 2022

Susan Crim, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/Enforcement
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

**RE: Cease and Desist, Title IV Limitation Appeal Request
OPE ID: 00727500**

Dear Director Crim:

On July 18, 2022, the U.S. Department of Education, Office of Federal Student Aid (FSA or the Department) issued a cease and desist letter to Eastern Gateway Community College (EGCC) to limit its participation in federal financial aid. Although the Department's notice of limitation is deficient in providing the timeframe for appeal (34 CFR 668.86(b)(1)(iii)), EGCC hereby files its appeal well-within the 20 days in which such a limitation should have been made effective based on the notice of intent.

Thousands of union-affiliated students will lose their education opportunity because of the Department's groundless action, wholly unsupported by the facts and controlling law. EGCC hereby appeals the cease and desist letter limiting its Free College Benefit program for union-affiliated students from participation in federal financial aid, pursuant to 20 U.S.C. § 1094 and 34 C.F.R. § 668.86. EGCC sets forth (1) the issues and facts in dispute, and (2) pertinent facts and rationale as to why the limitation is unfounded in the attached appeal.

Please find included with this submission an original and four copies of the July 18th cease and desist letter and relevant documentation in support of the appeal. Please do not hesitate to contact me if you have any questions regarding this submission. Thank you in advance for your time and attention to this matter.

A handwritten signature in black ink that reads "Michael Geoghegan".

Michael Geoghegan, President
Eastern Gateway Community College

Enclosures

Cc: Bonnie Graham, Brustein & Manasevit, PLLC
Holly Welch, Office of Ohio Attorney General Dave Yost
Kurt Pawlak, Eastern Gateway Community College

EXHIBIT 3



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**UNITED STATES DEPARTMENT OF EDUCATION
ADMINISTRATIVE ACTIONS AND APPEALS DIVISION**

EASTERN GATEWAY COMMUNITY COLLEGE)	Appeal of Limitation
)	Determination: Cease and Desist
Applicant.)	
)	OPE ID: 00727500
)	

**THE APPEAL OF THE U.S. DEPARTMENT OF EDUCATION'S
CEASE AND DESIST LETTER LIMITING TITLE IV PARTICIPATION**

Eastern Gateway Community College (EGCC) hereby appeals the U.S. Department of Education's cease and desist letter and the resulting limitation of its participation in federal financial aid, dated July 18, 2022, and received by EGCC via email the same day. Specifically, EGCC disputes the underlying determination that the Free College Benefit Program violates the Title IV prohibition against assessing charges to Title IV recipients that are higher than those charges assessed to non-Title IV recipients.

Issues and Facts in Dispute

1. EGCC disputes that it assesses tuition and fee charges that are higher for Title IV recipients as compared to non-Title IV recipients.
2. EGCC disputes that outside entities "provide virtually no funds" toward the Free College Benefit Program.
3. EGCC disputes that its institutional support to cover the "last-dollar" of college tuition for union-affiliated students qualifying for the Free College Benefit violates any statutory or regulatory requirement.
4. EGCC disputes that all comparable last-dollar scholarship programs are fully funded by a third-party source of income.
5. EGCC disputes that last dollar scholarships, including through institutional support and tuition waivers, create discrepant tuition pricing for Pell-eligible students as compared to Pell-ineligible students.
6. EGCC disputes that its implementation of the Free College Benefit has put EGCC in "a very precarious financial position" or "calls into question EGCC's continued viability as an educational institution," as stated in the letter.

Pertinent Facts and Reasons Supporting EGCC's Position

7. On February 7, 2022, the Department began an off-site program review at EGCC. While the review is still ongoing, on July 18, 2022, the Department issued a cease and desist letter to EGCC, informing the college for the first time of its interpretation that the Free College Benefit Program administered by EGCC violates the Title IV prohibition against assessing charges to Title IV recipients that are higher than those charges assessed to non-Title IV recipients, and limiting EGCC's participation in federal financial aid by determining the Free College Benefit Program as ineligible.



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8. The Department directed EGCC to immediately cease enrollment in the Free College Benefit Program. The Department also instructed EGCC that the approximately 4,000 new students currently enrolled in the Fall term (scheduled to begin August 15, 2022), would be ineligible to participate in federal financial aid. The Department indicated it would “provide directives regarding currently enrolled students shortly.” EGCC followed up with the Department on July 19th, 20th, and 21st seeking additional information regarding the status of the approximately 29,000 union-affiliated students currently enrolled in the Free College Benefit for the Summer and/or Fall terms (beginning in less than three weeks), but as of this filing, EGCC has not received any further directive regarding these students’ participation and eligibility for financial aid or a more specific timeline on which such details might be offered or discussed.
9. EGCC’s Free College Benefit Program provides access to free college for union members and their families. The program follows the “last-dollar” or “last-mile” model of free college, in which an entity – including a State government or institution – will pay any tuition remaining at a public college after a student’s existing federal financial aid award is used. This model is one of two common models of free college, and is used by States at large, for example, by Rhode Island, Tennessee, and Utah, but it is also employed by individual institutions, like EGCC.
10. The Department’s limitation of the Free College Benefit Program’s participation in federal financial aid is erroneous because of its flawed underlying determination. Contrary to the Department’s allegation, all union-affiliated students enrolled at EGCC under the Free College Benefit Program are charged the same tuition, fees and books, regardless of federal financial aid eligibility, and consistent with 20 U.S.C. 108711, *inter alia*:
 - a. After acknowledging that all students are charged the same tuition and fees, the Department incorrectly and without legal support argues that using institutional scholarship or tuition waivers for the remaining balances of union-affiliated students qualifying for the Free College Benefit Program effectively changes the underlying cost of attendance and therefore is unallowable.
 - b. Further, the Department attempts to distinguish EGCC’s program from other free college programs by arbitrarily and without notice or legal support concluding that last-dollar scholarships must be funded by an “outside entity”, which it asserts may include state appropriations or a college’s foundation, but cannot be funded through institutional scholarships or tuition waivers.
 - c. The Department’s incorrect determination that offering institutional support through tuition waivers changes the cost of attendance and results in differential tuition charges to Pell-eligible and ineligible students directly contradicts existing regulations and guidance on Pell being a first source of aid, and tuition waivers only impacting *other* need-based Title IV awards:

Pell Grants are considered to be the first source of aid for students with financial need. A student’s eligibility for aid from the other need-based programs is then determined by subtracting the student’s [expected family contribution] and [estimated financial assistance] (including the student’s Pell Grant) from the [cost of attendance (COA)]. FSA Handbook (2021-2022), Vol. 3, Ch. 7, p. 3-193.

Effects of waivers on COA: If your school treats a waiver as a payment of tuition and fees that have actually been charged to a student, then the waiver is considered estimated financial assistance (EFA) and the full amount of the tuition and fees are included in a student’s COA. FSA Handbook (2021-2022), Vol. 3, Ch. 2, p 3-60.



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A correctly determined Pell Grant is never adjusted to take into account other forms of aid. FSA Handbook (2021-2022), Vol. 3, Ch. 7, p. 3-195.

- d. The notion that Pell Grants serve as the first source of aid is affirmed in federal financial aid regulations. Pell eligibility requirements at 34 CFR § 690.6 do not include consideration of other forms of aid (generally referred to as *estimated financial assistance*). In contrast, eligibility requirements for other forms of aid, such as student Stafford loans at 34 CFR § 682.201(a), require that a student “receive[] a final determination, or, in the case of a student who has filed an application with the school for a Pell Grant, a preliminary determination, from the school of the student's eligibility or ineligibility for a Pell Grant.” See also, 34 CFR 673.5(b) (noting that estimated financial assistance must be taken into account when awarding Federal Perkins loan, FSEOG or FWS employment). As such, Pell eligibility, waivers of tuition, non-need based awards, scholarships, and other grants must first be determined in order for other federal sources of financial aid to be calculated.
 - e. EGCC’s application of a last-dollar scholarship program through the Free College Benefit Program complies with the regulations and the FSA Handbook. First, eligibility for Pell Grants is calculated and applied in accordance with federal financial aid regulations, using the student’s enrollment status, cost of attendance, and expected family contribution. Next, any state aid or employer education grants are applied. After Pell Grants and applicable state aid and employer assistance, the remaining balance, if any, is covered by the Free College Benefit last-dollar scholarship, through tuition waivers.
 - f. As required by Ohio law, EGCC submitted a request for approval by the Chancellor of the Ohio Department of Higher Education (ODHE) to offer union-affiliated students institutional support through the Free College Benefit Program. 381.170 of Am. Sub. H.B. 166 and Directive 2009-011. EGCC received approval through ODHE for offering institutional support as tuition waivers up to \$3,500 per year for each eligible in-state student, and up to \$6,000 per year for each eligible out-of-state student. See attached ODHE Directive. In receiving ODHE’s approval for the tuition waivers for union-affiliated students participating in the Free College Benefit Program, EGCC continues to receive full state subsidy for Ohio students, which provides 25% of additional aid in support of the Free College Benefit Program.
 - g. The Free College Benefit last-dollar scholarship (through tuition waivers) covers, but does not exceed, the student’s financial need. Accordingly, eligible students participating in the Free College Benefit Program do not incur debt, unless they voluntarily choose to borrow loans (limited to \$1,000 to remain eligible for the benefit).
11. The Department’s limitation of the Free College Benefit Program’s participation in federal financial aid through the issuance of the July 18th cease and desist letter, without notice of opportunity for hearing, is in violation of EGCC’s due process rights and 34 CFR 668.86(b)(1)(iii).
12. The Department failed to provide adequate notice and comment prior to its arbitrary interpretation that the definition of “cost of attendance” (20 USC 108711) requires last-dollar scholarships to be funded through outside entities, and not institutional support or tuition waivers for qualified students. The Department does not and cannot explain how its interpretation can be reconciled with other non-need based institutional scholarships and tuition waivers that institutions offer to qualifying students. For example, how is an institutional scholarship covering the remaining tuition after Pell and state aid for union-affiliated students different from institutional scholarships applied after Pell offered to student athletes, or students taking a particular program, or students from a particular state or county?



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Why would institutional scholarship for one program result in discrepant cost of attendance for Pell eligible and ineligible students, but not others?

13. The Department's erroneous interpretation and resulting limitation on federal financial aid for the Free College Benefit Program warrants expedited review and intervention by the tribunal, given the approximately 33,000 union-affiliated students currently enrolled in the Free College Benefit Program for the Summer and Fall terms that will be harmed by denied access to their planned education.
14. EGCC is not precluded from resolving discrepancies in its records submission and submitting further documentary proof after the filing of this appeal.

Respectfully Submitted

A handwritten signature in black ink that reads "Michael Geoghegan".

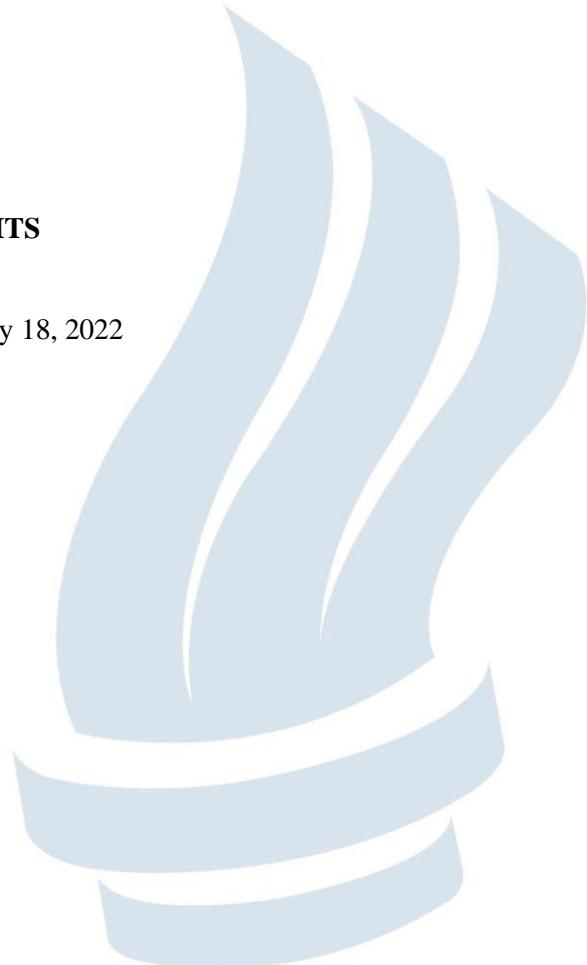
Michael Geoghegan, President
Eastern Gateway Community College

Dated: July 22, 2022

INDEX OF EXHIBITS

Exhibit A: Notice of Limitation: Cease and Desist Letter dated July 18, 2022

Exhibit B: ODHE Directive on Tuition Waiver



CERTIFICATE OF SERVICE

I, Bonnie Graham, hereby certify that the Cease and Desist, Title IV Limitation Appeal Request, was filed via hand delivery with the Administrative Actions and Appeals Service Group, U.S. Department of Education, Federal Student Aid/Enforcement, 830 First Street, NE - UCP3, Room 84F2, Washington, DC 20002-8019 and copies were mailed via USPS and emailed to:

Lisa Brown
Office of the General Counsel
U.S. Department of Education
Room 6E310
400 Maryland Ave SW
Washington, D.C., 20202
Lisa.brown@ed.gov

Jeremy Early, Ed.D.
Division Chief, Chicago/Denver School
Participation Division
U.S. Department of Education, Federal Student Aid
230 South Dearborn Street
Chicago, IL 60604
Jeremy.early@ed.gov

Holly Welch
Assistant Section Chief – Education Section
Office of Ohio Attorney General Dave Yost
30 E. Broad St., 14th Floor
Columbus, OH 43215
Holly.welch@ohioago.gov



Bonnie L. Graham, Esq.

BRUSTEIN & MANASEVIT PLLC
Counsel for Eastern Gateway
Community College

Dated: July 22, 2022

Exhibit A
Notice of Limitation
Cease and Desist Letter dated July 18, 2022



July 18, 2022

Michael Geoghegan
Interim President and CFO
Eastern Gateway Community College
4000 Sunset Boulevard
Steubenville, OH 43952-3598

Sent electronically:
mgeoghegan@egcc.edu

Sent via Document Center at:
cod.ed.gov

Re: Free College Benefit Program
OPE ID: 00727500

Dear President Geoghegan:

On February 7, 2022, the U.S. Department of Education (Department) began an off-site program review at Eastern Gateway Community College (EGCC). During the course of the review, the Department obtained information regarding the Free College Benefit program that was being administered under contractual arrangements with various outside entities. Although the program review is still ongoing, this letter is to inform you that this program, as currently implemented, violates the Title IV prohibition against assessing charges to Title IV recipients that are higher than those charges assessed to non-Title IV recipients. Consequently, Eastern Gateway must cease providing the Free College Benefit program as currently implemented.

All students enrolled at EGCC under the Free College Benefit Program are charged for tuition, fees, and books. Students who receive Federal Pell Grant (Pell) funds have their Pell disbursements credited to their accounts to reduce total charges. The remainder of the charges are then reduced to zero by applying some form of “scholarship” to the remaining balance. If a student also received a state grant, the “scholarship” was applied after both Pell and the state grant funds. Students who do not receive Pell/state grant funds, have their entire tuition, fee and book charges reduced to zero. The notations on student ledger cards make it appear that there is truly a “scholarship” being funded by one of many outside entities. The Department has determined that outside entities provide virtually no funds. EGCC is merely waiving/writing off all non-Pell/state grant charges on student accounts, and falsely making it appear that the students are being funded by outside entities. Essentially, under this program, students who receive Pell funding are being charged for the program, but students not receiving Pell are not. This is in direct violation of the Higher Education Act of 1965, as amended, 20 U.S.C. 1070 et seq. (Title IV).

The Title IV statute makes clear that when establishing the tuition and fee component for Title IV recipients, an institution must use an amount that is “normally assessed a student carrying the same academic workload.” 20 U.S.C. §§ 1087ll (cost of attendance). In implementing this statutory provision, the Department has consistently stated that a recipient of Title IV assistance cannot be assessed charges that are higher than what is charged to a student not receiving Title IV aid. See 2021-2022 Student Financial Aid Handbook, Vol. 3 at 56. As set forth above, Title

IV recipients enrolled under the Free College Benefit Program are charged more than non-Title IV recipients enrolled under the same program. Consequently, this model violates the Title IV statute, and therefore, it cannot be used by EGCC as currently implemented.

In response to the questions raised during the review, EGCC submitted a memo drafted by its attorneys that attempts to support the institution's position that the Free College Benefit Program does not violate the Title IV statute. The memo provides four examples of what counsel calls last-dollar scholarship programs other colleges and universities use that EGCC believes are similar to its Free College Benefit Program. In your interview on April 19, 2022, you mentioned two additional programs, the "Tennessee Promise Program" and "California College Promise Grant" that EGCC also claims are the same. The Department has reviewed the details of all of the programs and concluded that not one of the programs results in Pell-eligible students being charged more than non-Pell students. All programs cited by EGCC are funded by an actual income source, whether it be from the institution's Foundation or the State, and those funds are used for qualifying students. In none of the programs are charges for non-Title IV students written off entirely, resulting in Title IV students being charged and non-Title IV students not, a result that is prohibited under the Title IV Statute.

It should be noted that under the Free College Benefit program, students with lower levels of need have a higher "write-off" and ultimately fewer charges than the needier Pell students. The ultimate result of the implementation of the Free College Benefit Program is that the Pell Grant Program and the State Grants are funding the educational costs of students whose incomes make them ineligible for either. Further, the implementation of the Free College Benefit put EGCC in a very precarious financial position because the funds needed to actually educate students are severely limited forcing EGCC to drastically cut its academic and operating expenses. This calls into question EGCC's continued viability as an educational institution.

EGCC must not disburse Pell funds to any new students enrolling in the Free College Benefit Program until it is redesigned to charge full tuition and fees to all non-Pell eligible students. To accomplish this, EGCC must cease waiving the tuition and fees for non-Pell students. The Department will provide directives regarding currently enrolled students shortly. To assist the Department with this issue, please complete the attached spreadsheet and submit it within the next 14 days. EGCC should submit the spreadsheet to Leslie Orofino at Leslie.Orofino@ed.gov.

If you have any questions concerning this letter, you may contact Leslie at (312) 730-1733 or at the email provided.

Sincerely,

Jeremy Early, Ed.D.
Division Chief
Chicago/Denver School Participation Division

cc: Kurt Pawlak, Interim Director of Financial Aid, kpawlak@egcc.edu
Ohio Department of Education, mexline@highered.ohio.gov
Holly Welch, Assistant Section Chief – Education Section, Office of Ohio Attorney
General Office, Holly.Welch@OhioAGO.gov
North Central Association of College and Schools, the Higher Learning Commission,
legalaffairs@hlcommission.org

Exhibit B

ODHE Directive on Tuition Waiver



**Department of
Higher Education**

Mike DeWine, Governor
Randy Gardner, Chancellor

DIRECTIVE 2021-051

December 6, 2021

**Re: CONSIDERATION OF A REQUEST BY EASTERN GATEWAY COMMUNITY COLLEGE
TO CONTINUE TO REDUCE STANDARD TUITION RATES FOR STUDENTS
PARTICIPATING IN THE UNION EDUCATION ACHIEVEMENT GRANT PROGRAM.**

§375.30.30 of Am. Sub. H.B. 119 of the 127th General Assembly required any waiver of tuition for a student or class of students not otherwise permitted by law at a state-assisted institution of higher education be approved by the Chancellor of Higher Education (the “Chancellor”). On April 17, 2009, the Chancellor signed Directive 2009-011 establishing procedures for institutions to follow when requesting to waive standard tuition rates. Section §381.170 of Am. Sub. H.B. 110 of the 134th General Assembly continues this authority of the Chancellor for this biennium.

Pursuant to the continued authority in §381.170 of Am. Sub. H.B. 166 and Directive 2009-011, Eastern Gateway Community College (“EGCC”) has requested for academic years 2021-2022 and 2022-2023, and any summer term that begins prior to June 30, 2023 to continue to reduce standard tuition for students participating in the Union Education Achievement Grant Program (the “Grant”). EGCC will first apply any state and federal financial aid dollars and employer tuition reimbursements. Remaining tuition costs will be waived as described below up to \$3,500 per year for each eligible in-state student and up to \$6,000 for each eligible out of state student.

EGCC has demonstrated the following:

- EGCC’s Board of Trustees approved a resolution authorizing this tuition waiver at its meeting on March 31, 2021. A copy of the resolution is attached. The programs are described below.
 - Union Education Achievement Grant Program parameters and eligibility are as follows
 - a list of eligible unions will be developed by EGCC’s President and Chief Financial Officer. Eligibility will include union members in Ohio, members of national affiliates, whether public or private. A full list of unions and national affiliates that are eligible to participate will be listed on EGCC’s website.
- EGCC has submitted a specific request to provide up to a \$3,500.00/\$6,000.00 tuition waiver for each student participating in either program in each of the two academic years covered by this request. Tuition will be waived as follows:

- Up to \$131 per credit hour of instructional and general fees will be waived for Jefferson County residents after other aid is applied first.
- Up to \$136 per credit hour of instructional, general fees and out of county surcharge will be waived for Ohio residents* who are not residents of Jefferson County after other aid is applied first. These students will be charged an out of county surcharge of \$1 per credit hour.
 - Standard tuition for these students is \$137/credit hour minus \$136 waived = \$1/credit hour.
- *Ohio resident includes an out of state student participating in this program that is receiving the in-state tuition rate under a tuition reciprocity agreement entered into pursuant to section 3333.17 of the Revised Code.
- Up to \$243 per credit hour of instructional, general fees and out of county and out of state surcharges will be waived for nonresident students after other aid is applied first. These students will be charged an out of county rate of \$1 per credit hour and an out of state surcharge of \$1 per credit hour.
 - Standard total tuition for these students is \$245/credit hour minus \$243 waived = \$2/credit hour.
- Any increase in the out of state surcharge in any term or academic year will result in increasing the amount being waived by an equal amount such that the in-county, in-state students have the entire amount waived after other aid is applied first. The out of county, in state student have only \$1 out of county surcharge to pay after other aid is applied first, and the out of state students are assessed a \$1 out of county surcharge and an additional \$1 out of state surcharge after other aid is applied first.
- EGCC proposes that the duration of the waiver be academic years 2021-2022 and 2022-2023, and any summer term that begins prior to June 30, 2023.
- It is estimated that the proposed waiver will affect approximately 4,500 students each academic year.
- The goals of this tuition waiver are as follows:
 - Provide in-seat and distance learning educational opportunities for Ohio working men and women and their families including correctional officers, firefighters, police officers, child care and other civil service workers.
 - Increase student academic success and retention by eliminating any financial obstacles to success and working with state and local employers to create environments supportive of increased educational attainment.

- In academic year 2018-2019, EGCC measured distance learning Ohio students receiving waivers to have a persistence rate of 73% and course completion rate of 78%. For our non-Ohio on-line students, the Spring student success percentage as measured by a grade of C or above was 76.9%. In academic year 2020-2021, the Ohio student persistence rate was 79.5% and course completion rate was 86.6% and for Non-Ohio students, persistence rate was 76.9% and 85.6% completions.
- EGCC will measure the attainment of these goals by collecting data on academic success including completion, persistence and retention as well as career and salary advancement.

Agency staff reviewed the request and posted its recommendations to the ODHE website for the purpose of providing a public comment period before final approval by the Chancellor. No public comments were received. JSF

Based upon my review of staff recommendations, I hereby determine the following:

- A. The above reduction in standard tuition rates for students participating in the union education achievement grant program is fully approved for academic year 2021-2022; and
- B. The above reduction in standard tuition rates for students participating in the union education achievement grant program is conditionally approved for academic year 2022-2023. Full approval is contingent on EGCC's satisfactory progress as it relates to the Higher Learning Commission's ("HLC") letter to EGCC dated November 8, 2021. If the Chancellor determines EGCC has not made satisfactory progress with HLC, the Chancellor will provide notice to EGCC regarding the discontinuance of the reduction in standard tuition for academic year 2022-2023, as detailed above.

The directive will take immediate effect.



Randy Gardner
Chancellor



Resolution #2021 - 4

Resolution to Approve Tuition Waiver for Ohio Public Service Union Education Achievement Grant program

WHEREAS, October 31, 2019, the Chancellor of the Ohio Department of Higher Education approved a continued biennium tuition waiver for Eastern Gateway Community College (the "College") free college benefit program, **the Ohio Public Service Union Education Achievement Grant (the "Achievement Grant")**, it established in conjunction with Ohio unions and their national affiliates to provide post-secondary degree opportunities for a diverse group of working men and women including policemen, firefighters, correctional service officers; whether public or private, including members of the area building trades unions to participate in the Achievement Grant. A full list of all Ohio unions and national affiliates who are eligible to participate will be listed on the College's website at www.egcc.edu; and

WHEREAS, the Achievement Grant leverages certain state and local government tuition reimbursement programs with federal Title IV Pell grants to insure that these opportunities can be afforded by all our citizens; and

WHEREAS, to continue and expand the Achievement Grant, the College needs to pursue a tuition waiver renewal from the Chancellor of the Ohio Department of Higher Education (ODHE) for this population to continue in the Achievement Grant program in its current form for the new State of Ohio biennium beginning July 1, 2021; and

NOW, THEREFORE BE IT RESOLVED that the Board of Trustees of Eastern Gateway Community College (the "Board") authorizes the College's Vice President for Academic Affairs and Deputy Chief Financial Officer to establish the guidelines and financial parameters for eligibility and participation the Achievement Grant; and

BE IT FURTHER RESOLVED, to cover the cost of the tuition assistance portion of the Achievement Grant, the Board authorizes the College President to request the following tuition waivers from the Chancellor of the Ohio Department Higher Education effective for the State of Ohio FY22-23 Biennium.

- **\$131 per credit hour will be waived for eligible students who are residents of Jefferson County. This is a complete waiver of tuition (instructional and general fees)**
- **\$136 per credit hour will be waived for eligible students who are Ohio residents but not Jefferson County residents. These students will be charged \$1 per credit hour.**
- **\$243 per credit hour will be waived for eligible students who are not Ohio residents. These students will be charged \$2 per credit hour.**

- The maximum waiver will be \$3,250 per student per academic year for a projected 4,500 students.

Moved: Mr. Meredith
Second: Ms. LaGuardia

Roll Call: Maiorano, Meredith, LaGuardia, Dennison, Coy, Gasior

**Ayes: 6
Nays: 0
Abstain: 0
Carried: Yes**

Chair, James Gasiot

3-31-2021
Date

Angela Mastros, Secretary of the Board

Date

- The maximum waiver will be \$3,250 per student per academic year for a projected 4,500 students.

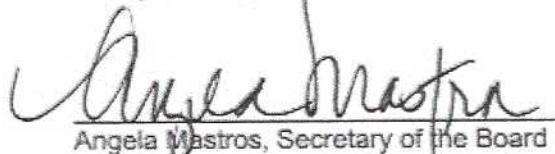
Moved: Mr. Meredith
Second: Ms. LaGuardia

Roll Call: Maiorano, Meredith, LaGuardia, Dennison,
Coy, Gasior

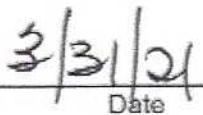
Ayes: 6
Nays: 0
Abstain: 0
Carried: Yes

Chair, James Gasior

Date



Angela Mastros, Secretary of the Board



Date